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Attorneys for Defendants
COUNTY OF ALAMEDA, GREGORY
AHERN, BRETT KETELES, CARLA
KENNEDY, DAVID BRADY, GREGORY
MORGADO and KERRY JACKSON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STEVEN ANGELL, MILES AVERY, MOLLY)
BATCHELDER, SRI LOUISE also known as)
Louise Coles, CICILY COOPER, SHAREEF)
ELFIKI, THEODORE HEXTON, LINDSAY)
WEBER, Individually and on behalf of others)
similarly situated,)

Plaintiffs,

vs.

CITY OF OAKLAND, COUNTY OF)
ALAMEDA, HOWARD JORDAN, JEFFREY)
ISRAEL, ERIC BRESHEARS, RON YELDER,)
DARREN ALLISON, STEVE TULL,)
EDWARD TRACEY, ANTHONY RACHAL,)
SEAN WHENT, GREGORY J. AHERN,)
BRETT KETELES, CARLA KENNEDY,)
DAVID BRADY, GREGORY L. MORGADO,)
KERRY JACKSON, DOES 1-250,)

Defendants.

Case No.: C13-0190 NC

**STIPULATION AND APPLICATION TO
CONTINUE SETTLEMENT
CONFERENCE AND CASE
MANAGEMENT CONFERENCE AND
ALL RELATED DATES AND
[PROPOSED] ORDER AS MODIFIED**

Complaint Filed: January 14, 2013

The parties herein hereby stipulate and jointly apply to the Court for relief from existing
deadlines in the above-referenced matter as follows:

By order dated April 18, 2013, the Hon. Nathanael Cousins of this Court scheduled a

1 further case management conference in the above referenced action for October 16, 2013, at 10:00
2 a.m., in addition to other pre-trial scheduling deadlines.

3 By order dated April 22, 2013, this Court scheduled a settlement conference with
4 Magistrate Judge Laurel Beeler for September 25, 2013 at 9:30 a.m.

5 The parties have been working diligently to complete preliminary discovery necessary to
6 make the initial settlement conference productive. The parties have exchanged written discovery.
7 The depositions of the plaintiffs have been completed. Plaintiffs' counsel have had an opportunity
8 to carry out inspections of both the Santa Rita and Glenn E. Dyer jail facilities. Plaintiffs have
9 received numerous documents requested from the City and the County, but need additional
10 documents which have not yet been produced, in order to take depositions of City and County
11 personnel necessary to a productive settlement conference. As a consequence, the parties believe
12 that it is in the best interests of justice and judicial economy for the Court to continue the present
13 case management, settlement conference, and class certification hearing dates and they do hereby
14 stipulate and respectfully request that the Court continue all pending deadlines as follows:

15 Last date for plaintiffs to file motion for class certification: March 21, 2014

16 Case management conference: February 5, 2014 at 10:00 a.m.

17 Filing of joint case management conference statement: January 29, 2014

18 Completion of settlement conference with Judge Laurel Beeler: January 21, 2014

19 Last date to amend complaint or add new parties: October 31, 2013

20
21 DATED: September 10, 2013.

22 YOLANDA HUANG, ESQ.

23
24 By: /s/ Yolanda Huang
25 YOLANDA HUANG, ESQ.
26 Attorneys for Plaintiffs
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1 DATED: September 10, 2013.

SIEGEL & YEE

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3
4 By: /s/ Dan Siegel
DAN SIEGEL, ESQ.
Attorneys for Plaintiffs

6 DATED: September 10, 2013.

OAKLAND CITY ATTORNEY'S OFFICE

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9 By: /s/ William E. Simmons
WILLIAM E. SIMMONS, ESQ.
Attorneys for Defendants
CITY OF OAKLAND, et al

11 DATED: September 10, 2013.

12 BOORNAZIAN, JENSEN & GARTHE
A Professional Corporation

14
15 By: /s/ Gregory J. Rockwell
GREGORY J. ROCKWELL, ESQ.
Attorneys for Defendants
COUNTY OF ALAMEDA, et al.

ORDER

GOOD CAUSE appearing therefor, and the parties having so stipulated, the Court hereby GRANTS the parties' joint application for continuance of all existing deadlines and hearing and filing dates as follows:

February 3, 2014

Last date for plaintiffs to file motion for class certification: ~~March 21, 2014~~

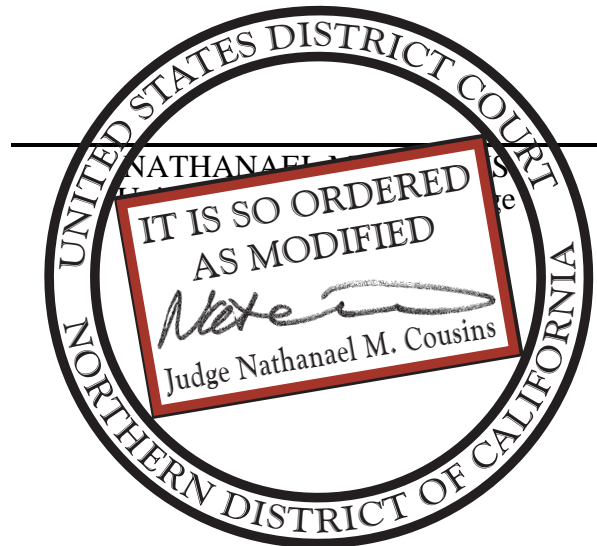
Case management conference: February 5, 2014 at 10:00 a.m.

Filing of joint case management conference statement: January 29, 2014

Completion of settlement conference with Judge Laurel Beeler: January 21, 2014

Last date to amend complaint or add new parties: October 31, 2013

Dated: September 18, 2013



PROOF OF SERVICE BY ELECTRONIC SERVICE

I, the undersigned, declare as follows:

I am employed in the County of Alameda, State of California. I am over the age of 18 years and not a party to the within action. My business address is 555 12th Street, Suite 1800, P. O. Box 12925, Oakland, California 94604-2925.

On the date indicated below, at the above-referenced business location, I served the **STIPULATION AND APPLICATION TO CONTINUE SETTLEMENT CONFERENCE AND CASE MANAGEMENT CONFERENCE AND ALL RELATED DATES AND [PROPOSED] ORDER** on the below-named parties and caused said document to be transmitted using ECF as specified by General Order No. 45 to the following parties

:

Yolanda Huang, Esq. P.O. Box 5475 Berkeley, CA 94705 Tel: (510) 329-2140 Fax: (510) 580-9410 Dan Siegel, Esq. Anne Weills, Esq. SIEGEL & YEE 499 14 th Street, Suite 300 Oakland, CA 94612 Tel: (510) 839-1200 Fax: (510) 444-6698	Attorneys for Plaintiffs STEVEN ANGELL, MILES AVERY, MOLLY BATCHELDER, SRI LOUISE also known as Louise Coles, CICYLY COOPER, SHAREEF ELFIKI, THEODORE HEXTON, LINDSAY WEBER, Individually and on behalf of others similarly situated
Barbara J. Parker, Esq. Randolph W. Hall, Esq. William E. Simmons, Esq. Jamilah A. Jefferson, Esq. Oakland City Attorney's Office One Frank H. Ogawa Plaza, 6th Fl. Oakland, CA 94612 Tel: (510) 238-7686 Fax: (510) 238-6500 E-mail: jjefferson@oaklandcityattorney.org wesimmons@oaklandcityattorney.org	Attorneys for Defendants CITY OF OAKLAND, et al.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed at Oakland, California, on September 10, 2013.

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5 /s/ Candace Hankins

Candace Hankins

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